

Federal Defenders  
OF NEW YORK, INC.

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

Barry D. Leiwant  
*Interim Executive Director  
and Attorney-in-Chief*

*Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge*

March 29, 2024

**BY ECF**

Hon. Katherine Polk Failla  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

**RE: United States v. Willie Murray  
24 Cr. 072 (KPF)**

Dear Judge Failla:

I write on behalf of Willie Murray to respectfully request that the Court grant an extension the deadline to file a *pro se* notice of appeal of this Court's bail determination until April 19, 2024. Mr. Murray also requests a 30-day adjournment of his April 2, 2024 status conference. The government does not object to these requests.

On February 15, 2024, Mr. Murray was presented and arraigned before Your Honor on a two-count indictment alleging mail theft and bank fraud. That day, the government moved for detention on the grounds that Mr. Murray posed a serious risk of flight. Following a contested bail hearing, the Court denied bail and set a status conference for April 2, 2024. Mr. Murray has since remained incarcerated at Hudson County Department of Corrections.

After consulting with counsel, Mr. Murray requests an extension of the deadline to file a *pro se* notice of appeal of the Court's bail determination. Because Mr. Murray is currently incarcerated, he needs additional time to file his notice of appeal. The government does not object to this request.

Mr. Murray also requests a 30-day adjournment of his April 2, 2024 status conference. He recently received discovery and needs additional time to review and discuss the discovery with counsel, including materials he has not yet seen, which have been marked "attorney's possession only" and require an in-person visit with counsel at Hudson County Department of Corrections.

The government also requests, with the consent of defense counsel, that the Court exclude time through the next-scheduled conference under the Speedy Trial Act to allow the Mr. Murray to continue reviewing discovery and discuss a potential pretrial resolution of this case. *See* 18 U.S.C. § 3161(h)(7)(A).

Thank you for your consideration of these requests.

Respectfully submitted,

/s/

Marne L. Lenox, Esq.

*Counsel for Willie Murray*

cc: Adam Margulies, Assistant U.S. Attorney

Application GRANTED. The status conference scheduled for April 2, 2024, is hereby ADJOURNED to **May 1, 2024**, at **10:00 a.m.** The conference will take place in Courtroom 618 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York.

Time is hereby excluded under the Speedy Trial Act between **April 2, 2024** and **May 1, 2024**. The Court finds that the ends of justice served by excluding such time outweigh the interests of the public and the Defendant in a speedy trial because it will permit Defendant to continue reviewing discovery with counsel, and provide the parties time to discuss a potential pretrial resolution of this case.

Furthermore, Defendant's application for an extension of the deadline to file his notice of appeal is hereby GRANTED. He shall file his notice of appeal on or before **April 19, 2024**.

The Clerk of Court is directed to terminate the pending motion at docket entry 12.

Dated: March 29, 2024  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE